GALVANO & XANTHAKIS, P.C.

ATTORNEYS AT LAW 150 BROADWAY **SUITE 2100**

NEW YORK, NEW YORK 10088

(212) 349-5150

FACSIMILE (212) 849-5298

197 ROUTE 18 SOUTH, SUITE 8000 PMB 4158 BAST BRUNSWICK, N.J. 08816 (782) 745-8745

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MATTHEW D. KELLY* KYLES, ROMONDS* ELINA LECOUR* CHERYL L. MASSELLI*

JANE L. STONE* OF COUNSEL

JOANNE VITALE OFFICE MANAGER

April 8, 2008

Hon. Paul A. Crotty U.S. District Judge Southern District of New York 500 Pearl Street Chambers 735, Courtroom 20-C New York, New York 10007

Saul Santiago v. J.M. Heaford Limited, et al.

No. 08 Civ. 3005 (PAC) Our File No: 5530-P

Dear Judge Crotty,

MEMO ENDORSED

JOSEPH GALVANO*

CRAIG A. LAMSTER*

ADMITTED N.Y BAR

STEVEN F. GRANVILLE*

ANTHONY C. XANTHAKIS+

CONSTANTINE A. PANTAZIS*

+ADMITTED N.Y., N.J. & D.C. BARS

*ADMITTED N.Y. & N.J. BARS

We represent the plaintiff, Saul Santiago with respect to the above referenced matter. An initial conference is scheduled before your Honor on Monday, April 14, 2008 at 3:30 p.m. writing to seek an adjournment.

On March 4, 2008, following an attempt to serve plaintiff's complaint on J.M. Heaford, Limited at an address in North Carolina, it was learned the sole viable address for J.M. Heaford, Limited would be in Altrincham, Cheshire, England. Arrangements have been made to properly serve this entity in its home country. We have been advised that service will be complete by April 30, 2008.

In the interim, contact was made with J.M. Heaford, Limited's insurance carrier and assigned counsel. I have been assured that once service is properly made, an answer will be promptly interposed.

In light of the foregoing, wherein one defendant has yet to appear in this matter, I respectfully request that the conference be adjourned to allow sufficient time for all parties to appear and partake in drafting the initial scheduling order.

I have discussed the foregoing with counsel for J.M. Heaford, Inc. and assigned counsel for J.M. Heaford, Limited, all of whom have agreed to an adjournment with the Court's consent until May 7, May 13 or May 14, 2008. There have been no such previous requests.

Thank you for your courtesies.

EL/hs

CC: Via Facsimile (212)986-3509 And E-mail (pcooper@brhr.com) Peter Cooper, Esq. Biedermann, Reif, Hoenig & Ruff A Professional Corporation Attorneys for J.M. Heaford, Inc. 570 Lexington Avenue, 16th Floor New York, New York 10022

> Via Facsimile (516) 747-1992 And E-mail (lcascone@cklaw.com) Cascone & Kluepfel 1399 Franklin Avenue, Suite 302 Garden City, New York 11530

> > lication GRANTED. The conference is adjourned to 14,08 at 3:15 pm in Courtroom 20-C

UNITED STATES DISTRICT JUDGE